

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

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In re: Case No.: 23-60507  
The Roman Catholic Diocese of Ogdensburg, New York, Chapter 11  
Debtor.

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**GRANITE STATE INSURANCE COMPANY'S JOINDER TO INSURERS'  
LIMITED OBJECTION TO THE MOTION FOR ENTRY OF AN ORDER  
APPROVING MEDIATION FEE AGREEMENT PURSUANT TO SECTIONS  
105(A) AND 363(B) OF THE BANKRUPTCY CODE**

Granite State Insurance Company ("Granite State") joins the *Partial Objection of Defendant Employers Insurance Company of Wausau's (f/k/a Employers Insurance of Wausau a Mutual Company f/k/a Employers Mutual Liability Insurance Company of Wisconsin) to the Diocese's motion for Entry of an Order Approving Mediation Fee Agreement* (Dkt. No. 79) ("Wausau's Partial Objection") and *Certain Underwriters at Lloyd's, London and London Market Insurance Companies' Limited Objection to the Motion for Entry of an Order Approving Mediation Fee Agreement Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code* (Dkt. No. 437) ("LMI's Limited Objection").

Specifically, Granite State objects to the part of The Roman Catholic Diocese of Ogdensburg, New York's (the "Diocese") *Motion for Entry of an Order Approving Mediation Fee Agreement Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Docket* (Dkt. No. 412) (the "Diocese's Motion") seeking an Order directing that the mediation costs be borne only by the Diocese and the Insurers who are parties to the Adversary Proceeding<sup>1</sup> for the reasons set forth in Wausau's Partial Objection and LMI's Limited Objection. Granite State joins Wausau's request

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<sup>1</sup> *The Roman Catholic Diocese of Ogdensburg, New York et. al v. Certain Underwriters at Lloyd's, London, Certain London Market Companies et. al*, Adv. No. 23-80013 (Bankr. N.D.N.Y.) ("Adversary Proceeding").

that the Order regarding Judge Sontchi's fees specify that the Insurers pay their share of 50% only for mediation sessions that involve the Insurers. As an alternative proposal, Granite State would also support LMI's request that a 25% share of Judge Sontchi's fees and expenses be divided amongst each of the Debtor, Parishes, Committee and Insurers at the conclusion of mediation.

Dated: March 26, 2024  
New York, NY

Respectfully submitted,

CARLTON FIELDS, P.A.

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